

Phu Do Nguyen (SBN 187966)
David Dang (SBN 304001)
Josh Strand (SBN 315469)
DO PHU & ANH TUAN, APC
10517 Garden Grove Blvd.,
Garden Grove, CA 92843

Attorneys for Defendants,
Oanh Tran, an individual and
BH Media

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

HAU DZUONG (a.k.a. Andy Thanh), an
individual; dba BLUE OCEAN MUSIC, a
California Sole Priority,

Plaintiffs,

vs.

OANH TRAN, an individual; BH MEDIA, a
Vietnam corporation incorporated in Hanoi,
Vietnam; and DOES 1 to 10, inclusive,

Defendants.

Case No.: 8:17-cv-00953-JVS-KES

**DEFENDANTS' OPPOSITION TO THE
MOTION TO WITHDRAW AS COUNSEL
OF RECORD WITHOUT SUBSTITUTION
FOR PLAINTIFF HAU DZUONG aka
ANDY THANH dba BLUE OCEAN MUSIC**

Assigned to the Honorable James V. Selna

Hearing Date: February 25, 2019
Time: 1:30 P.M.
Dept. 10-C

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that BH Media and Oanh Tran hereby submits their Opposition to the Motion to Withdraw as Counsel of Record without Substitution for Plaintiff Hau Dzuong aka Andy Thanh.

ARGUMENT

Defendants' Opposition is limited to the matters stated in the *Declaration of David Bernstein*. Specifically, with regards to paragraphs 16 and 17. In Paragraph 16, Mr. Bernstein requests that Defendants' Motion to Permit the Filing of their Counterclaim (Docket No. 205), which is currently set for hearing on February 11, 2019, be rescheduled until after the hearing for this

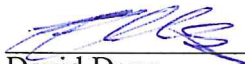
1 motion to withdraw so as to give Plaintiff “ample” time to seek counsel or proceed *pro se*.
2 Defendants oppose this request because Plaintiff has had ample time to review Defendants’ motion
3 to permit the filing of the amended counterclaim since the time the motion was filed. Thus, he has
4 had sufficient time to oppose and challenge it. There is no reason in law or in fact to drag out this
5 matter.

6 Additionally, Mr. Bernstein requests in Paragraph 17 that any immediate deadlines be
7 continued to give Plaintiff time to seek counsel or proceed as a *pro se* litigant. Defendants also
8 object to this request. There is no good cause for the Court to grant such a request. Nor has good
9 cause been shown. Plaintiff is not an inexperienced litigant. Nor is he a novice with court rules and
10 procedures. Plaintiff should not be permitted to pick and choose which court proceedings he will
11 participate in, and only actively participate in those which he deems will result in a positive
12 outcome for him.

13 Based on the above arguments, Defendants respectfully requests that this Court leaves all
14 litigation deadlines and Defendants’ Motion to Take Leave and File a Counterclaim, intact.

15
16 Dated: 2/4/19

DO PHU & ANH TUAN, APC

17
18
19 
20 David Dang
21 Phu Do Nguyen
22 Josh Strand
23 Attorneys for Defendants
24 Oanh Tran and BH Media
25
26
27
28